

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

SIGNET MARITIME CORPORATION

PLAINTIFF

VS.

CASE NO. 1:16-cv-180 HSO-JCG

WEEKS MARINE, INC.

DEFENDANT

COMPLAINT FOR DAMAGES

NOW INTO COURT, comes Plaintiff, Signet Maritime Corporation ("Signet"), and files this Complaint for Damages against the Defendant, Weeks Marine, Inc. ("Weeks Marine"), and respectfully avers as follows:

1.

Plaintiff Signet Maritime Corporation is duly organized under the laws of the State of Delaware and is authorized to conduct business in the State of Mississippi. Signet provides harbor towing and ship escort services in the Port of Pascagoula.

2.

Made defendant herein is Weeks Marine, Inc., a New Jersey corporation with its principal place of business at 4 Commerce Drive, Cranford, New Jersey 07016. Upon information and belief, Weeks Marine may be served through its registered agent in the State of Mississippi at National Corporate Research Ltd., 840 Trustmark Building, 248 East Capitol Street, No. 840, Jackson, Mississippi 39201.

3.

This suit is brought pursuant to the general maritime laws in the United States of America as well as the laws and statutes of the State of Mississippi. Plaintiff's claims fall within this Honorable Court's admiralty and maritime jurisdiction pursuant to 28 U.S.C. § 1333 and Rule 9(h) of the Federal Rules of Civil Procedure.

4.

Venue is proper before this Honorable Court as the acts and omissions giving rise to Plaintiff's claims occurred within this Honorable Court's judicial district pursuant to 28 U.S.C. § 1391.

5.

At all times relevant hereto, Weeks Marine was the owner and/or operator of the CAPTAIN FRANK, which performed dredging work in Bayou Casotte in Pascagoula, Mississippi between December 9, 2015 and January 13, 2016.

6.

After Weeks Marine completed dredging operations inside of Bayou Casotte, the CAPTAIN FRANK was repositioned offshore to Horn Island Pass. After the move, Weeks Marine left several pieces of dredging equipment inside Bayou Casotte including, but not limited to, buoys and anchors.

7.

On January 16, 2016, at around 11:40 P.M., the M/V SIGNET VICTORY, was escorting the tanker M/V NORWEGIAN SEA inside the navigable channel of Bayou Casotte near channel marker 10A. A copy of the AIS/GPS position report and track

summary for the relevant times of this operation is attached as Exhibit A (in Greenwich Mean Time).

8.

Through no fault of Signet or SIGNET VICTORY, a derelict and unlit buoy left behind by Weeks Marine became entangled in the SIGNET VICTORY's main propulsion system, also referred to as a Z-Drive.

9.

That night, Signet dispatched divers and equipment to inspect the propulsion system aboard the SIGNET VICTORY and to clear the ropes and cables of the derelict buoy from the vessel's Z-Drive propulsion system.

10.

The SIGNET VICTORY was unavailable for service for more than nine hours while the vessel's propulsion system was inspected and the fouled buoy cleared, resulting in lost charter hire and other damages.

11.

Weeks Marine was negligent in the following non-exhaustive list of particulars:

- A. Failing to secure its dredging equipment outside of the navigable channel;
- B. Obstructing navigation;
- C. Abandoning dredging equipment inside the channel of a navigable waterway;
- D. Failure to maintain lighting and markings on obstructions to navigable waterways; and

- E. Failure to file a notice to mariners or otherwise warn traffic in the area of the abandoned dredge equipment.

12.

Failure to inspect the dredging equipment it left behind inside of Bayou Casotte.

13.

In addition to the negligent acts and omissions listed above, Weeks Marine also violated state and federal regulations including, but not limited to, the Rivers and Harbors Act and Coastal Guard regulations requiring obstructions in and around navigable waterways to be marked and lit.

14.

The SIGNET VICTORY was inside of the Bayou Casotte navigable channel at all times pertinent hereto.

15.

Signet has made a good faith demand on Weeks Marine in an effort to resolve these claims. Signet's efforts have not been successful.

16.

As a direct result of Weeks Marine's negligence, statutory violations, and fault, Signet incurred damages including but not limited to:

A. Divers to inspect and clear fouled propellers	\$875.00
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B. Loss of use	\$9,585.00
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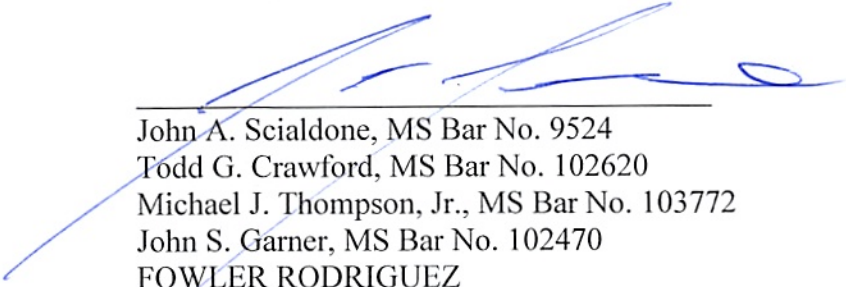
Bosarge Diving Inc.'s invoice is attached as Exhibit B and Signet's January 21, 2016 invoice is attached as Exhibit C.

WHEREFORE, premised considered, Signet Maritime Corporation prays that after due proceedings be had, there be judgment rendered in favor of the Plaintiff and against Defendant, Weeks Marine, Inc. for damages which are reasonable, together with interest from the date of judicial demand, together with all costs of these proceedings and all other general and equitable relief which Plaintiff is entitled to.

Respectfully submitted, this 27th day of May, 2016.

SIGNET MARITIME CORPORATION, Plaintiff

BY: FOWLER RODRIGUEZ



John A. Scialdone, MS Bar No. 9524
Todd G. Crawford, MS Bar No. 102620
Michael J. Thompson, Jr., MS Bar No. 103772
John S. Garner, MS Bar No. 102470
FOWLER RODRIGUEZ
2505 14th Street, Suite 500 (39501)
Post Office Box 4080
Gulfport, MS 39502-4080
Telephone: (228) 822-9340
Facsimile: (228) 822-9343
Email: jscialdone@frfirm.com
tcrawford@frfirm.com
mthompson@frfirm.com
jgarner@frfirm.com

Attorneys for Signet Maritime Corporation, Plaintiff